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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Soheil Zaerpour & the People of the United States

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Write the full name of each plaintiff or petitioner.

Case No. 1:21 CV 09680

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-against-

**NOTICE OF MOTION**

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JP Morgan Chase Bank N.A, et al,

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Write the full name of each defendant or respondent.

PLEASE TAKE NOTICE that

On August 9, 2022

\_\_\_\_\_ plaintiff or defendant name of party  
who is making the motion requests that the Court:

Reconsiders its decision to dismiss (without prejudice) for failure to serve the defendants properly.

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Briefly describe what you want the court to do. You should also include the Federal Rule(s) of Civil Procedure or the statute under which you are making the motion, if you know.

In support of this motion, I submit the following documents (check all that apply):

- ☐ a memorandum of law  
☒ My own declaration, affirmation, or affidavit

x The following additional documents: Wikipedia's entry titled "Banking in Switzerland" for background information.

August 10, 2022

/s/ Soheil Zaerpour

Dated

Signature

Soheil Zaerpour

XX

Name

Prison Identification # (if incarcerated)

16-C Thornton Place, Clifton, NJ 07012

Address

City

State

Zip Code

Telephone Number (if available)

E-mail Address (if available)

(862) 668-4036

Soheil.Zaerpour@Njwg.CAP.GOV

SDNY Rev: 5/24/2016

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Fill in above the full name of each plaintiff or petitioner.

Case No. 1:21 CV 09680

-against-

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JP Morgan Chase Bank, N.A., et al.

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Fill in above the full name of each defendant or respondent.

**DECLARATION**

In support of this Motion to Reconsider.

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Briefly explain above the purpose of the declaration, for example, "in Opposition to Defendant's Motion for Summary Judgment."

I, Soheil Zaerpour, declare under penalty of perjury that the

following facts are true and correct:

In the space below, describe any facts that are relevant to the motion or that respond to a court order. You may also refer to and attach any relevant documents.

Dear Judge Cronan,

I have received your order for dismissal to my surprise. Basically you accuse me of negligence since I did not serve the Defendants properly according to the Federal Rules of Civil Procedure. The fact of the matter is that all the Defendants have received my Complaint and subsequent documents for at least 8 months as attested by their responses filed via ECF.<sup>1</sup> That is what should matter at the end and the Court gave them plenty of time to prepare for their answers. Nobody at the Court, or at NYLAG which I consulted, told me that I had to ask for any “time extension” and serve the documents again during these 8 months, and they have lawyers who are supposed to assist me with this Case and they have had access to all my ECF documents since the beginning.

I would like you to take notice that all my actions were diligent since day one, 20 years ago. I have asked the New York District Attorney’s office to assist me in identifying the criminals as reported in the 2013-NJDC Complaint against the FBI.<sup>2</sup> As an example they should have (and probably have) traced all my online FX trading

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<sup>1</sup> <https://www.courtlistener.com/docket/61569167/zaerpour-v-jp-morgan-chase-bank/>

<sup>2</sup> <https://www.courtlistener.com/docket/4311419/zaerpour-v-federal-bureau-of-investigation/>

back to the criminals as the issue of espionage kept happening without any interruption *after* I complained to the FBI by phone and letters.<sup>1</sup> This is an indication that these (unidentified) people probably control the US and foreign governments.<sup>23</sup> The FBI never contacted me in 20 years to tell me they were not going to help the People of the United States as explained in the Complaint.<sup>4</sup> This is gross negligence (dereliction of duty) and corruption at the highest level of the Justice department and the government and nobody seems to care about that.<sup>5</sup> This affects *all* the American and world citizens to the tune of billions of dollars, not including injury or death as explained in my original Complaint and Press Release in 2006 already.<sup>6</sup> Contrary to what the defendants' Counsel claim in their memoranda, I did not know myself such powerful enemies nor did I have any complaint in the course of their legal activities as reported to the Judge in 2014 in NJD (ECF no.8).<sup>1</sup> All I have stated about these major banks is *after* the crime happened 20 (or so) years ago. I have had no lawyer to assist me in this totally gratuitous crime all those years and by no fault of my own. I have been the direct victim and my proof is undisputed by the federal Judge in NJDC or by the FBI who is supposed to help all US citizens. To-date, the FBI has not provided any logically explanation for heir non-action in this case. You must hold these (yet unidentified) Officers to account for treason and for grave criminal and repeated

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<sup>1</sup> <https://www.courtlistener.com/docket/4311419/6/zaerpour-v-federal-bureau-of-investigation/>

<sup>2</sup> <https://www.prweb.com/releases/world/peace/prweb449517.htm>

<sup>3</sup> <https://www.courtlistener.com/docket/4311419/12/zaerpour-v-federal-bureau-of-investigation/>

<sup>4</sup> <https://www.courtlistener.com/docket/61569167/1/zaerpour-v-jp-morgan-chase-bank/>

<sup>5</sup> <https://www.courtlistener.com/docket/4311419/1/zaerpour-v-federal-bureau-of-investigation/>

<sup>6</sup> <https://www.prweb.com/releases/world/peace/prweb449517.htm>

injustices against the people of the United States and world citizens. All the proof and responses by the FBI and NJDC are available at your fingertips in the linked NJD Court documents.<sup>1</sup>

I am respectfully asking this Court to grant me time extension to serve the documents via the Court since I cannot afford to serve all the 16 defendants (as amended in ECF no. 50) myself because of lack of resources and money. Up until now, I thought that I had no sufficient proof to file a Complaint against any single individual (or Company) because of fraudulent concealment and my 2017-Complaint was filled *firstly* to stop the statute of limitation (ECF no. 57).<sup>23</sup> My objective in the 2013-Complaint's against the FBI was to obtain reparation for the damages and obtain an explanation for their repeated *apparent* non-action. All what the Defendants say in their memoranda is a lie and distortion of facts and the statistical independent PROOF, as stated politely in my opposition response to their motion to dismiss already (ECF no. 57).<sup>456</sup>I would very much need legal assistance as lack of energy is

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<sup>1</sup> <https://www.courtlistener.com/docket/4311419/zaerpour-v-federal-bureau-of-investigation/>

<sup>2</sup> <https://www.courtlistener.com/docket/61569167/57/1/zaerpour-v-jp-morgan-chase-bank/>

<sup>3</sup> <https://www.courtlistener.com/docket/61569167/57/zaerpour-v-jp-morgan-chase-bank/>

<sup>4</sup> <https://www.courtlistener.com/docket/61569167/57/zaerpour-v-jp-morgan-chase-bank/>

<sup>5</sup> <https://www.courtlistener.com/docket/61569167/50/1/zaerpour-v-jp-morgan-chase-bank/>

<sup>6</sup> Important: For statistical analysis purposes:

1. It is imperative that ALL my 3 Forex accounts be analyzed SIMULTANEOUSLY to make sense of it, such as in a partial HEDGING strategy between the accounts, as explained in detail my 2006-Press Release (attachments no. 1 & 9).
2. Instead of single "sell" or "buy" orders, the "AVERAGE buy" or "average sell" order numbers should be considered (e.g. in "averaging down" or "averaging up" strategy), as explained in attachment no. 9 of my 2006-Press Release (Answer to question no. 18).

also a negative factor for me. I have been dealing with this issue for way too long and by no fault of my own while being the victim of this crime. This case has drained me emotionally and financially as these yet unidentified criminals (individually speaking) evidently wanted and still want to deny me of the resources and any financial income and a “normal life” all those years. The rest would be better explained “in camera” and “ex-parte” since I am dealing with a major crime and yet unidentified individual criminals. As a single example, “they” do not want me to obtain my commercial aviation license for which I have successfully completed all the requirements as documented in my aviation logbook and despite of my continuous diligent efforts for years and the fact that I met ALL the FAA standards and training requirements. All the while, I got the letter by President Clinton (after I visited the White House) thanking me at the beginning of 2001 for my diligent efforts for World Peace (see ECF 50-3) .<sup>12</sup> I have no problem in this country except what is ultimately a terrorist crime against the People of the United States if you understand the implications and all the facts of this Case. I have been an Officer in “good standing” with the Civil Air Patrol (i.e. the official US Air Force Auxiliary) since 2008. This an ongoing criminal case of major proportion and I ask the Court to grant me the assistance and support that I deserve given the fact and evidence the Court has received already and which it does not dispute in any way shape or form (ECF no. 50).

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<sup>1</sup> <https://www.courtlistener.com/docket/61569167/50/2/zaerpour-v-jp-morgan-chase-bank/>

<sup>2</sup> <https://www.courtlistener.com/docket/61569167/50/3/zaerpour-v-jp-morgan-chase-bank/>

I stay at your disposal in person for any additional explanation or  
documentation of the facts of this case as deemed appropriate by this Court.

Respectfully submitted,

By: Soheil Zaerpour,  
Economist (Pro Se)

August 9, 2022

/s/ Soheil Zaerpour

Executed on (date)

Signature

Soheil Zaerpour

XX

Name

Prison Identification # (if incarcerated)

16-C Thornton Pl., Clifton, New Jersey 07012

Address

City

State

Zip Code

(862) 668-4036

soheil.zaerpour@njwg.cap.gov

Telephone Number (if available)

E-mail Address (if available)